

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 3:12-CR-137
)	
KOLON INDUSTRIES, INC.,)	
JONG-HYUN CHOI,)	
IN-SIK HAN)	
JU-WAN KIM,)	
KYEONG-HWAN RHO)	
YOUNG-SOO SEO)	
)	
Defendants.)	

**APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY
UNDER LOCAL CRIMINAL RULE 57.4 FOR THE
LIMITED PURPOSE OF CHALLENGING PROPER SERVICE**

Jeffrey Graham Randall, Petitioner, respectfully represents to the Court:

1. That Petitioner is a member of the California State Bar with a bar identification number of 130811, and a member of the bar of the District of Columbia with a bar identification number of 980243;
2. That Petitioner is a member of the law firm of Paul Hastings LLP with offices at 1117 S. California Ave., Palo Alto, CA 94304, (650) 320-1800 (firm phone #), (650) 320-1850 (direct dial #), (650) 320-1950 (fax #), JeffRandall@paulhastings.com;
3. That Petitioner is admitted to practice before the following courts: United States Supreme Court; United States Courts of Appeals for the Fourth Circuit, the Ninth Circuit, and the Federal Circuit; all California Federal Courts; and United States District Court for the Eastern District of Texas;

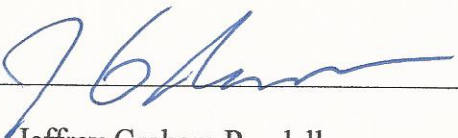
4. That Petitioner certifies that the rules of the Federal Court in the District in which Petitioner maintains his office extends similar *pro hac vice* admission privileges to members of the bar of the Eastern District of Virginia;

5. That Petitioner has not been reprimanded in any court outside this jurisdiction nor has there been any action in any court outside this jurisdiction pertaining to his conduct or fitness as a member of the bar;

6. That Petitioner certifies that, within ninety (90) days before the submission of this application, he has read the Local Rules of this Court and that his knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Criminal Procedure, and the Federal Rules of Evidence is current;

7. That Petitioner is not a full-time employee of the United States of America; and

8. That Petitioner respectfully prays that he be admitted to practice before this Court only for the limited purpose of challenging proper service of the summons. Neither this application for admission *pro hac vice*, for the limited purpose of challenging proper service, nor the appearance of counsel at any hearing to challenge proper service, shall be deemed to be a general appearance in any way subjecting the indicted corporation to the jurisdiction of this court.



Jeffrey Graham Randall

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all the qualifications required for admission to the bar of this Court; and that I have examined the applicant's personal statement. I affirm that his personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice* for the limited purpose of challenging proper service.

Respectfully submitted, this 10th day of December, 2012,

/S/ Rhodes B. Ritenour

Rhodes B. Ritenour (Virginia Bar No.
71406)

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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of December, 2012, I electronically filed the foregoing with the clerk of court using CM/ECF system which will then send a notification of electronic filing (NEF) to counsel named below:

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Attorneys for United States of America

By: /S/ Rhodes B. Ritenour

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